REMARKS

In response to the drawing objections, Application has the following comments:

1) for elements 120, 134 and 140, Figure 8 has been amended along with the pertinent part of the specification to reflect the change in Figure 8; and

2) for elements 42, 70, etc, these elements are used consistently in different figures and therefore do not require any change. For example, element 42 refers consistently refers to a "local user driven application" in various figures and thus no change and amendment to the drawings is necessary.

In addition, Applicant has amended claim 3 to overcome the examiner's rejection under 35 USC 112, second paragraph.

PRIOR ART REJECTIONS

In response to the examiner's rejection of claims 1-20 as being anticipated by US Patent No. 6,658,464 to Reisman ("Reisman"), Applicant respectfully traverses the rejection because that examiner has not established (based on the anticipation standard set forth below) that Reisman anticipates claims 1-20 for the reasons set forth below and therefore the anticipation rejection based on Reisman should be withdrawn.

Anticipation Standard

A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). Furthermore, "The identical invention must be shown in as complete detail as is contained in the ... claim." *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). The elements must be arranged as required by the claim, but this is not an *ipsissimis verbis* test, i.e., identity of terminology is not required. *In re Bond*, 910 F.2d 831, 15 USPQ2d 1566 (Fed. Cir. 1990). *See also MPEP 2131 et seq.*

Claim 1-14

Claim 1 is not anticipated by Reisman because each and every element of the claim is not found expressly or inherently in Reisman. In particular, Reisman does not disclose "an initiating program having an instruction that generates a request for access to a local resource, the request including a token and having the form of a hyperlink and wherein the local resource is not

accessible directly from the initiating program." Reisman discloses user station software that controls transport, storage and presentation of content from a remote source (*See Reisman Title.*) Reisman also discloses an offline browser (*See Reisman at Col. 36, line 20 – Col. 37, line 24 which was cited by the examiner in the office action*) that allows the user to access local web pages. Thus, the offline browser in Reisman accesses local content that is accessible by the offline browser (which is a specially designed piece of software). Thus, the element "an initiating program having an instruction that generates a request for access to a local resource, the request including a token and having the form of a hyperlink and wherein the local resource is not accessible directly from the initiating program" is not found in Reisman.

Furthermore, Reisman does not disclose "a translator program that receives the access request from the initiating program, the translator program further comprising instructions that generate a return token in response to the access request and instruction that return the return token to the initiating program, the return token further comprising a hyperlink containing a path to the local resource." Reisman discloses a link interceptor (*See Reisman at col. 43, lines 13-60*) wherein a link request issued by the browser 120, for a locally available resource, has its destination corrected so that the link is still a link that cannot be accessed due to the reasons described in the background of the patent application. In contrast, the translator program generates a return token that contains a hyperlink containing a path to the local resource that allows the initiating program to securely access the local resource using the initiating program. Thus, this element is not found in Reisman. Thus, the anticipation rejection of claim 1 cannot be maintained.

Furthermore, the anticipation rejection of claims 2-14 cannot be maintained for at least the same reasons as claim 1.

Claims 15-20

Claim 15 is not anticipated by Reisman because each and every element of the claim is not found expressly or inherently in Reisman. In particular, Reisman does not disclose "generating a request, by an initiating program, for access to a local resource, the request including a token and having the form of a hyperlink and wherein the local resource is not accessible directly from the initiating program." Reisman discloses user station software that controls transport, storage and presentation of content from a remote source (*See Reisman Title.*) Reisman also discloses an

offline browser (*See Reisman at Col. 36, line 20 – Col. 37, line 24 which was cited by the examiner in the office action*) that allows the user to access local web pages. Thus, the offline browser in Reisman accesses local content that is accessible by the offline browser (which is a specially designed piece of software). Thus, the element "generating a request, by an initiating program, for access to a local resource, the request including a token and having the form of a hyperlink and wherein the local resource is not accessible directly from the initiating program" is not found in Reisman.

Furthermore, Reisman does not disclose "generating a return token, by a translator program, in response to the access request" or "returning the return token to the initiating program, the return token further comprising a hyperlink containing a path to the local resource." Reisman discloses a link interceptor (*See Reisman at col. 43, lines 13-60*) wherein a link request issued by the browser 120, for a locally available resource, has its destination corrected so that the link is still a link that cannot be accessed due to the reasons described in the background of the patent application. In contrast, the translator program generates a return token that contains a hyperlink containing a path to the local resource that allows the initiating program to securely access the local resource using the initiating program. Thus, this element is not found in Reisman. Thus, the anticipation rejection of claim 15 cannot be maintained.

Furthermore, the anticipation rejection of claims 16-20 cannot be maintained for at least the same reasons as claim 15.

<u>CONCLUSION</u>

In view of the above, it is respectfully submitted that Claims 1-20 are allowable over the prior art cited by the Examiner and early allowance of these claims and the application is respectfully requested.

The Examiner is invited to call Applicant's attorney at the number below in order to speed the prosecution of this application.

The Commissioner is authorized to charge any deficiencies in fees and credit any overpayment of fees to Deposit Account <u>No. 07-1896</u>.

Respectfully submitted,

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